

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)
)
VS.) CASE NO. 02:06cr144-WKW-SRW
)
PAUL MEREZ GRAHAM)

UNOPPOSED MOTION TO CONTINUE

Comes now Defendant Paul Merez Graham, by and through counsel, and shows
as follows:

1. The undersigned counsel entered his appearance in this case on August 4, 2006.
2. The defense filed a motion to suppress on August 10, 2006.
3. A superseding indictment was filed on August 15, 2006. Arraignment on that indictment is scheduled for August 30, 2006.
4. The undersigned counsel received discovery materials relating to the new charges in the superseding indictment on August 23, 2006.
5. The defense filed an addendum to the aforementioned motion to suppress on September 12, 2006.
6. This case is currently on this Court's October 30, 2006 trial docket.
7. Additional time is needed to properly and reasonably litigate the motion to suppress and other matters attendant to the preparation for a trial or possible settlement without a trial.

8. The undersigned counsel has discussed this matter with opposing counsel, Tommie Brown Hardwick. Ms. Hardwick has no objection to a continuation of the trial date in this case.

9. Another speedy trial waiver will be filed within two business days.

WHEREFORE, Defendant Paul Merez Graham moves this Court to continue the trial of this case to the January 8, 2007 trial term.

s/ Thomas M. Goggans

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Paul Merez Graham

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CERTIFICATE OF SERVICE

I hereby certify that I have on this the 14th day of September, 2006, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such to the following: **Tommie Brown Hardwick, John T. Harmon, Christine A. Freeman**

s/ Thomas M. Goggans
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